



THE HOME BUILDERS FEDERATION

Date: 29th October 2015

Consultee ID: 707

Matter: 2

SEFTON LOCAL PLAN EXAMINATION

Matter 2 – Spatial Strategy and Green Belt

The HBF would like to submit the following further comments in respect of Matter 2.

Issue 2: Whether the strategy of promoting development within the urban areas and in Green Belt locations when necessary to meet the needs of the borough is a sustainable approach to growth which pays sufficient regard to the environmental and other constraints of the area.

2.1 A key objective of the Plan is to meet in full the diverse needs of the borough as close as possible to where they arise. In principle, is this objective based on a sound assessment of the socioeconomic and environmental characteristics of the area? Is the chosen spatial strategy the most sustainable of the three main development options (1-urban containment, 2-meeting needs, 3-optimistic growth)?

The HBF has no further comments at this stage.

2.2 Does the release of land from the Green Belt comply with the National Planning Policy Framework (NPPF)? Is the spatial strategy consistent with the need to promote sustainable patterns of development (NPPF paragraph 84)? Does the use of Green Belt land for development satisfy the “exceptional circumstances” test of national policy and if so, on what grounds?

The HBF supports the need to review the Green Belt within Sefton. The NPPF is very clear that in developing Local Plans Councils should positively seek to meet their objectively assessed needs (paragraphs 14, 47, 159). The NPPF also requires a significant increase in the supply of housing. The Council has clearly illustrated through its 2015 SHLAA (ref: HO6) that it cannot accommodate all of the housing required without incursion into the Green Belt. Furthermore housing delivery over the last 10 years indicates the dire situation within Sefton, where the Council has only met its housing requirement once. Thus indicating that Green Belt releases are long overdue.

The Council has also approached neighbouring authorities with regards to meeting housing needs (see LP12) but none of the neighbouring authorities are willing, or able, to meet any of Sefton's housing needs. Given that the plan is already not planning to meet its needs in full, hence the need for an early review, the need for Green Belt review is significantly increased. Furthermore once the requirements for employment

land are considered the incursion into the Green Belt is the only realistic alternative. Given the requirement to meet the areas objectively assessed needs and the lack of credible alternatives the HBF considers this represents exceptional circumstances.

It is noted that footnote 9 to NPPF paragraph 14 indicates that Green Belt boundaries may be a restriction to other policies contained within the NPPF. However footnote 9 does not indicate that Green Belt boundaries should not be changed, rather that change should be controlled or limited. Paragraph 83 of the NPPF further notes that Green Belt boundaries can be altered through the plan making process and therefore recognises that Green Belts are not preserved in perpetuity.

In common with our comments upon objectively assessed housing needs (see our Matter 3 hearing statement and submissions upon the publication version of the plan) the HBF consider that the Council may need to consider whether the proposed Green Belt releases are sufficient.

2.3 Overall, does the spatial strategy achieve an appropriate balance between the three dimensions to sustainable development: economic, social and environmental (NPPF paragraph 7). If the strategy is considered unsound, what alternative strategy should be pursued, and why? Is there compelling evidence that the growth sought in the SLP could be achieved without requiring Green Belt releases?

The HBF consider that the spatial strategy does strike the appropriate balance and does not consider there to be compelling evidence that the growth sought in the SLP could be met without requiring Green Belt releases. To the contrary, as stated above, the HBF consider that there is compelling evidence to indicate that Green Belt release is essential.

2.4 to 2.6

The HBF has no further comments at this stage.

2.7 Do the longer term needs of the area justify the identification of safeguarded land (policy MN8) to ensure that Green Belt boundaries will endure beyond the Plan period, as sought by national policy?

Yes, Sefton is tightly constrained by its Green Belt and therefore a failure to provide safeguarded land would inevitably require further alterations to the Green Belt at the end of the plan period. This is contrary to NPPF, paragraph 83.

The submitted plan provides sufficient safeguarded land for 1,000 dwellings (plan paragraph 6.78) which is less than two years supply, based upon the proposed housing requirement. The plan also notes that the development period of two sites are likely to extend beyond the plan period adding a further 500 units to the long-term supply (plan paragraph 6.78). This still only provides a maximum 1,500 unit capacity post plan period, or less than 3 years of the proposed housing requirement. This does not provide for the development needs stretching well beyond the plan period as required by the NPPF. The inevitable outcome will be a further review of the Green Belt at plan review. Given the acknowledged need for an early review of the plan, due to the implications of unmet housing needs (discussed in greater detail within our matter 3 hearing statement) the HBF consider that significantly more safeguarded land is likely to be required.

The HBF notes that the Council intends to address the issue of further releases through the early review process, due to the uncertainties over the amount of land required (see PMM.7, LP19). Whilst the HBF recognise this conundrum this simply delays yet a further key element of the plan until the review. Given that there is already a recognised need for more development the plan should seek to accommodate some of this additional need through safeguarded plan provision, which can be reconsidered at the early review, if the Council designates too much safeguarded land this could be considered for re-designation as Green Belt at that stage. Alternatively, and as a last resort, the plan could commit to the need to include more safeguarded land within through the early review to ensure that long-term development needs will be met and no further amendments will be required at the end of the plan period.

2.8 What provision has been made in the SLP and associated documents for alternative strategies to be implemented if development does not come forward as envisaged? Do the policies include sufficient flexibility and contingencies to take account of unexpected changes in circumstances?

No, the HBF does not consider sufficient contingencies are in place. We recommend that additional flexibility through the provision of safeguarded land be provided, which can be released through the early review. It is recognised that the plan does allocate more land than is required over the plan period, however given the poor levels of delivery over recent years the HBF consider that a buffer of sites, equating to 20% of the plan requirement, be provided to account for the none or under-delivery of sites. These could be in the form of contingency sites which are only released subject to specific criteria, such as the lack of a five year housing land supply or an increased need for housing.

2.9 Is the commitment to an early review of the Plan to address port expansion and, potentially, the residual housing need (paragraphs 4.42-4.44) given sufficient prominence? Should it form part of a policy?

Whilst the HBF does not support the early review of plans, particularly upon fundamental issues such as housing need, it is recognised that an early review mechanism is the only pragmatic solution to providing development within Sefton in the short-term. Our reasoning for this conclusion is set out within our matter 1 hearing statement. It is paramount that if the Inspector is to find the plan sound subject to an early review every endeavour is utilised to ensure that the Council fully commit to this process. The HBF does not consider that the commitment to an early review is given sufficient prominence in paragraphs 4.42-4.44 or the proposed main modification (PMM.5) identified within examination document LP19. The HBF consider that a policy within the plan would provide greater prominence and therefore recommends its inclusion. Furthermore the policy should acknowledge that its housing requirement is interim and will be updated within a designated timeframe, failure to adhere to the timeframe should render the housing requirement out of date. It should also be made clear that any backlog accrued against the housing requirement during this plan would be carried forward into the review. This backlog would need to be measured against the new objectively assessed housing needs of the area.

The LDS should also be updated as a matter of urgency to reflect the need for a review of the submitted plan and the timescale for its completion.

2.10 Are the principles of sustainable development identified in policy SD2 appropriate and do they reflect the particular circumstances of Sefton? If not, how should they be amended and why?

The HBF has no further comments at this stage.

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